



15 St Andrews Crescent,
Cardiff
CF10 3DB
Tel: (+44) 2921 690034

Email: kathryn@kewplanning.co.uk

Newport City Council
Planning Department
Civic Centre
Newport, South Wales
NP20 4UR

13 May 2026

Dear Sir/Madam

Town and Country Planning Act 1990 (Section 73)

Site/Location: Caerleon Comprehensive School, Cold Bath Road, Caerleon, Newport, South Wales, NP18 1NF

I write on behalf of Newport City Council, to **vary condition 1 and discharge conditions 8,9, 15 and 16** of planning permission **25/1030** for the *“Construction of a new sports and teaching facility including altered parking arrangements and associated landscaping and infrastructure”*.

This section 73 application seeks to capture the relocation of the sprinkler and hydrant tanks following detailed design and fire strategy considerations. The requirement and scope of this application have been prepared in line with advisory comments provided by the local planning authority following an informal discussion of the proposed changes.

Sprinkler & Hydrant Tank Relocation

Proposed changes

The submitted amendments introduce revisions to the previously approved site layout. The sprinkler tank is proposed to be relocated further west, to the rear of Block A, while the hydrant tank is to be repositioned to the northeast of the site, adjacent to the boundary with the existing Caerleon Scouts Hut.

The boundary adjoining the Scouts Hut comprises an existing 2.2m high wall, which is to be retained. In addition, the presence of the Scouts huts and mature trees provides a substantial degree of natural screening sitting at approximately 3.0–3.5m in height, contributing positively to the visual containment of the hydrant tank when viewed from the Scheduled Ancient Monument of the Caerleon Legionary Fortress.

The proposed boundary treatment for the tanks comprises hit-and-miss timber fencing. This approach aligns with the original design intent, as shown on the approved elevations and is therefore considered appropriate.

The site layout has been refined to accommodate the hydrant tank, resulting in minor adjustments to the parking arrangement. Motorcycle spaces and one standard parking bay have been relocated from the main car park to the western car park to facilitate this change.

These revisions have been carefully developed to avoid any impact on Root Protection Areas (RPAs). In addition, the soft landscape strategy at the southern end of N Block has been subtly amended to maintain and enhance ecological connectivity across the site.

Requirement for Relocation

During RIBA Stage 4, as the fire strategy was further developed in consultation with the appointed fire engineers, it became clear that the sprinkler and hydrant tank location proposed at RIBA Stage 3 (Planning) was not suitable in terms of fire tender access and could present an operational risk to the fire service.

As a result, alternative locations were carefully assessed, with a focus on maintaining close and safe proximity to the new building, while ensuring compliant and practical access for fire appliances. This process also took into account the spatial and operational constraints imposed by the existing school buildings.

The final selected locations were determined to meet these requirements, providing safe, accessible, and operationally appropriate solutions for fire service use.

These revisions are absolutely essential to allow the school to operate with fire safety measures in place. This is the only position that can ensure compliant accessible access to the fire appliances.

Drawing Amendments

For clarity and ease the list of amended drawings being proposed is set out in Table 1. This is to facilitate understanding which drawings are to replace those currently controlled and approved under Condition 1 of 25/1030.

Table 1 – S73 Drawing Amendments

Approved Drawings	Replacement Drawing
CCS-HLM-NN-XX-DR-A-00300-P03 New Block – Elevation	CCS-HLM-NN-XX-DR-A-00300-New Block - Elevations-P05
n/a	CCS-HLM-XX-XX-DR-L-00335-HYDRANT TANK ELEVATIONS-P01
CCS-HLM-00-00-DR-L-00007-P14 Landscape Plan GA	CCS-HLM-00-00-DR-L-00007-LANDSCAPE GA PLAN-P20
CB2183-CAM-XX-XX-DR-C-0612-S4-P02 Proposed Site Levels & Contour Sheet 2	CB2183-CAM-XX-XX-DR-C-0612-S4-P04_Proposed Site Levels & Contours Sheet 2
CB2183-CAM-XX-XX-DR-C-0611-S4-P02 Proposed Site Levels & Contour Sheet 1	CB2183-CAM-XX-XX-DR-C-0611-S4-P04_Proposed Site Levels & Contours Sheet 1
CB2183-CAM-XX-XX-DR-C-0610-S4-P02 Proposed Site Levels & Contour Overview	CB2183-CAM-XX-XX-DR-C-0610-S4-P04_Proposed Site Levels & Contours Overview
	CB2183-CAM-XX-XX-DR-C-0613-S4-P04_Proposed Site Levels & Contours Sheet 3
CB2183-CAM-XX-XX-DR-C-0507-S2-P01 Proposed Foul Drainage (Sheet 2 of 2)	CB2183-CAM-XX-XX-DR-C-0507-S4-P04_Proposed Foul Drainage (Sheet 2 of 2)
CB2183-CAM-XX-XX-DR-C-0506-S2-P01 Proposed Foul Drainage (Sheet 1 of 2)	CB2183-CAM-XX-XX-DR-C-0506-S4-P04_Proposed Foul Drainage (Sheet 1 of 2)

CB2183-CAM-XX-XX-DR-C-0505-S2-P01 Proposed Foul Drainage Overview	CB2183-CAM-XX-XX-DR-C-0505-S4-P04_Proposed Foul Drainage Overview
CB2183-CAM-XX-XX-DR-C-0504-S4-P02 Proposed Surface Water Drainage Sheet 3	CB2183-CAM-XX-XX-DR-C-0504-S4-P04_Proposed Surface Water Drainage (Sheet 3 of 3)
CB2183-CAM-XX-XX-DR-C-0503-S4-P02 Proposed Surface Water Drainage Sheet 2	CB2183-CAM-XX-XX-DR-C-0503-S4-P04_Proposed Surface Water Drainage (Sheet 2 of 3)
CB2183-CAM-XX-XX-DR-C-0502-S4-P02 Proposed Surface Water Drainage Sheet 1	CB2183-CAM-XX-XX-DR-C-0502-S4-P04_Proposed Surface Water Drainage (Sheet 1 of 3)
CB2183-CAM-XX-XX-DR-C-0501-S4-P02 Proposed Surface Water Drainage Overview	CB2183-CAM-XX-XX-DR-C-0501-S4-P04_Proposed Surface Water Drainage Overview
CB2183-CAM-XX-XX-DR-C-0500-S4-P02 Proposed Drainage Overview	CB2183-CAM-XX-XX-DR-C-0500-S4-P04_Proposed Drainage Overview
CB2183 CAM XX ZZ DR C 0201 P2 Vehicle Tracking Fire Appliance Sheet 2	CB2183-CAM-XX-XX-DR-C-0201-S4-P05_Vehicle Tracking Sheet 2
CB2183 CAM XX ZZ DR C 0200 P2 - Vehicle Tracking Fire Appliance Sheet 1	CB2183-CAM-XX-XX-DR-C-0200-S4-P05_Vehicle Tracking Sheet 1
CB2183-CAM-XX-XX-DR-C-0203-S2-P02_Vehicle Tracking (Rigid Lorry)	CB2183-CAM-XX-XX-DR-C-0201-S4-P05_Vehicle Tracking Sheet 2

Conclusion

In conclusion, the proposed amendments represent necessary changes to the approved scheme, arising from the development of the fire strategy. The relocation of the sprinkler and hydrant tanks ensures safe and practical access for fire service operations, while maintaining the overall integrity of the original design. The changes have been carefully considered in relation to the site context, avoiding impacts on trees, ecology and maintaining appropriate screening.

Partial Discharge of Conditions on 25/1030

As part of this submission, we are seeking to satisfy the need for further applications to fulfil the requirements of planning conditions 8, 9, 15 and 16. As such, further information is submitted for officers to review and evaluate to ascertain that enough has been provided to satisfy the requirements of each condition. Subsequently, we are seeking these conditions are re-worded on the new decision notice as compliance conditions.

The details for each of the conditions, along with the information submitted are set out in Table 2 below.

Table 2 – Information submitted to address existing conditions

Condition to be Discharged	Information Submitted
Condition 8 - Approval of External Plant and Infrastructure Details	- CCS-CFS-XX-XX-DR-X-000102-SprinklerSystemWaterSuppliesBuildersWorkLayout&Details-P02 - ASHP Specification CAHV-R450YA-HPB_JL22 - CCS-MCP-NN-RF-D-E-0005-Level RF Containment-P01 - CCS-MCP-NN-RF-D-E-0004-Level RF Containment-P01 - SolarEdge Design - Caerleon School (Eurener Nexa)
Condition 9 - Submission and Implementation of Detailed Landscaping Scheme	- CCS-HLM-00-XX-SH-L-45013-PLANTING SCHEDULE-P01 - CCS-HLM-00-00-DR-L-45401-SOFT LANDSCAPE TYPICAL DETAILS-P01 - CCS-HLM-00-00-DR-L-45012-SOFT LANDSCAPE PLAN Sheet 2-P01 - CCS-HLM-00-00-DR-L-45011-SOFT LANDSCAPE PLAN Sheet 1-P01
Condition 15 – External Lighting Strategy	- CCS-MCP-NN-XX-D-E-9001-External Lighting-P01
Condition 16 – Boundary Treatment	- CCS-HLM-00-00-DR-L-25001-BOUNDARY TREATMENT PLAN-P06 - CCS-HLM-00-XX-DR-L-40411-STREET FURNITURE AND FENCE DETAILS-P01

We hope that the information provided, along with the enclosed drawing updates, is sufficient to provide the LPA confidence in determining the proposed changes in a positive manner. If there are any further queries or clarifications required please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in cursive script that reads "Iwan Evans".

Iwan Evans MRTPI
Planner
KEW Planning